

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>IN RE:</b> <b>DAVY WOODS</b> <b>ANGELA B. WOODS</b>  <b>Debtors</b>	: : : :	<b>BK. No. 19-11128-elf</b>  <b>Chapter No. 13</b>
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**FREEDOM MORTGAGE CORPORATION**  
**Movant**

v.

**DAVY WOODS**  
**ANGELA B. WOODS**  
  
**Respondents**

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO  
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **FREEDOM MORTGAGE CORPORATION**. The property address is 309 ROSS COURT, WYNCOTE, PA 19095, Loan # ending in 5082. A Proof of Claim has/has not been filed on the claim register at # 17. A written Notice of Payment Change/Forbearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b) and Local Rule 20-3007.
2. The terms of the forbearance are as follows: Regular monthly mortgage payments starting with the August 1, 2020 through January 31, 2021 are suspended. Payment of the escrow component of the regular monthly mortgage payments.
3. The Creditor advises that no fees will be assessed against the loan with regard to this Notice of Forbearance.
4. Prior to the expiration of the forbearance period, Debtors must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into

loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan. A copy of the Forbearance Agreement is attached hereto as exhibit "A".

5. Creditor, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$2,083.24.
6. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No.89834

Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31387

Fax Number: 215-568-7616

Email: Thomas.Song@phelanhallinan.com

August 24, 2020

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**IN RE:** : **BK. No. 19-11128-elf**  
**DAVY WOODS** :  
**ANGELA B. WOODS** : **Chapter No. 13**  
**Debtors** :

**FREEDOM MORTGAGE CORPORATION**  
**Movant**

**v.**

**DAVY WOODS**  
**ANGELA B. WOODS**  
**Respondents**

**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on August 24, 2020.

JOHN L. MCCLAIN  
JOHN L. MCCLAIN AND ASSOCIATES  
P.O. BOX 123  
NARBERTH, PA 19072-0123

WILLIAM C. MILLER, ESQ.  
CHAPTER 13 TRUSTEE  
P.O. BOX 1229  
PHILADELPHIA, PA 19105

UNITED STATES TRUSTEE  
OFFICE OF THE U.S. TRUSTEE  
200 CHESTNUT STREET  
SUITE 502  
PHILADELPHIA, PA 19106

DAVY WOODS  
309 ROSS COURT  
WYNCOTE, PA 19095

ANGELA B WOODS  
309 ROSS COURT  
WYNCOTE, PA 19095

/s/ Thomas Song, Esquire  
Thomas Song, Esq., Id. No.89834  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31387  
Fax Number: 215-568-7616  
Email: Thomas.Song@phelanhallinan.com

August 24, 2020

Exhibit “A”



PO Box 50485, Indianapolis, IN 46250-0485

JOHN L MCCLAIN AND ASSOCIATES, JOHN L MCCLAIN  
PO BOX 123,  
NARBERTH, PA 19072

08/10/20

Re: ANGELA WOODS  
DAVY WOODS  
Case Number: 1911128  
Account Number: [REDACTED]

**IMPORTANT NOTICE: TO THE EXTENT THE BORROWER'S OBLIGATION HAS BEEN DISCHARGED IN BANKRUPTCY, IS SUBJECT TO THE AUTOMATIC STAY OR IS PROVIDED FOR IN A CONFIRMED PLAN, THIS COMMUNICATION IS FOR REGULATORY COMPLIANCE AND/OR INFORMATIONAL PURPOSES ONLY, AND DOES NOT CONSTITUTE A DEMAND FOR PAYMENT OR AN ATTEMPT TO IMPOSE PERSONAL LIABILITY FOR SUCH OBLIGATION.**

Dear Attorney,

Your client(s) initiated contact with us recently requesting a forbearance of mortgage payments as a result of impact due to the COVID-19 emergency. Therefore, Freedom has granted a forbearance on the account beginning on August 1, 2020 through and including January 31, 2021, in accordance with the CARES Act.

Due to your client's active status in bankruptcy, we are writing to ensure that, as counsel for the debtor, your client has made you aware of this forbearance request and Freedom's agreement to grant this request. We also want to ensure that you will take all actions that are necessary to address this forbearance in the bankruptcy case, as may be applicable.

We have enclosed an authorization form seeking your consent to allow Freedom and/or Freedom's representatives to continue to communicate directly with Freedom or its representatives regarding this forbearance, and any further potential loss mitigation options.



PO Box 50485, Indianapolis, IN 46250-0485

Upon receipt of this notice, please contact Freedom's designated bankruptcy counsel to confirm receipt, and to ensure that the lines of communication remain open so that we may work through this matter together.

Sincerely,

Bankruptcy Department  
Freedom Mortgage Corporation

cc: Borrower Name(s)  
FMC BK Counsel

**THE FOLLOWING DISCLOSURE IS MADE PURSUANT TO THE REQUIREMENTS OF THE FAIR DEBT COLLECTION PRACTICES ACT OR OTHER LAW OR REGULATION. IT IS NOT INTENDED TO CONTRADICT THE NOTICE STATED AT THE TOP OF THIS COMMUNICATION.**

**FREEDOM MORTGAGE CORPORATION IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**



PO Box 50485, Indianapolis, IN 46250-0485

AUTHORIZATION TO COMMUNICATE WITH DEBTOR(S)  
REGARDING POTENTIAL LOSS MITIGATION OPTIONS

Loan Number [REDACTED]  
Collateral Address 309 ROSS CT  
WYNCOTE PA 19095  
  
Debtor(s): ANGELA WOODS  
DAVY WOODS  
Case: 1911128

Freedom Mortgage Corporation (“Freedom”) is the mortgage loan servicer for the above-referenced loan. The debtor(s), identified above, are in an active bankruptcy.

At the Debtor(s) request, through outreach to Freedom, due to a hardship experienced as a result of the COVID-19 crisis, Freedom Mortgage has granted the debtor(s) a forbearance, from August 1, 2020 until January 31, 2021, (the “forbearance period”).

Debtor’s counsel JOHN L MCCLAIN AND ASSOCIATES, JOHN L MCCLAIN hereby authorizes Freedom and/or its agents to communicate directly with debtors during the forbearance period and thereafter, as reasonable and necessary, for the purposes of discussing potential loss mitigation options and general loan account information. Such authorized communications shall not constitute a violation of the automatic stay.

Firm Name: \_\_\_\_\_

Firm Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Authorized Representative: \_\_\_\_\_

Contact Information: \_\_\_\_\_ (telephone)  
\_\_\_\_\_ (email)  
\_\_\_\_\_ (other)

Signature: \_\_\_\_\_



PO Box 50485, Indianapolis, IN 46250-0485